

FILED

2011 MAR 31 AM 10:52

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

LARRY SNEED,
PLAINTIFF

Case No.

V.
CREDITONE BANK, N.A.,
DEFENDANT

JUDGE:

MAGISTRATE JUDGE;

COMPLAINT

Comes now the plaintiff, pro se, and for his complaint against the defendant would show the court the following:

1. Plaintiff states that defendant is in violation of 15 U.S.C. §1681, et seq. referred to as The Fair Credit Reporting Act (FCRA).

2. Plaintiff is a resident and citizen of Davidson County, Tennessee.

3. Defendant is a Nevada corporation located in Las Vegas, Nevada, and chartered as national bank by the Comptroller of the Currency (OCC No. 20291)

4. Defendant has repeatedly reported the yet unverified and inaccurate information to the credit reporting agencies contrary to requests by plaintiff for investigation.

5. Defendant is, and continues to be, in violation of 15 U.S.C. §1681s-2(b), which requires the furnisher of information to a credit reporting agency to respond within 30 days. This section also requires that unverified information be deleted from the consumer's report.

6. Defendant is liable under 15 U.S.C. §1681n for willful non-compliance with the FCRA. Plaintiff has repeatedly requested verification of the item in question. Defendant failed to respond, resulting in damages to plaintiff's ability to access credit opportunities, as well as causing mental stress and embarrassment to the plaintiff.

7. Defendant is further in violation of the FCRA, 15 U.S.C. §1681s-2(a)(5) by not providing a complete reporting of the item in question.

8. Defendant is in violation of the FCRA ibid, § s-2(a)(3), by not giving notice that this item ~~as being~~ in dispute.

9. Defendant has shown a general disregard for the protections afforded consumers and the responsibilities expected of furnishers of information to CRAs under the Fair Credit Reporting Act, and as amended by the FACT Act.

WHEREFORE, PLAINTIFF PRAYS:

That this honorable court will grant judgment for the Plaintiff and against the Defendant in the amount allowed by statute of \$1,000 per each reporting since January, 2010, a total of \$14,000; plus the costs of this action, attorney fees, if applicable, and such punitive damages as allowed by law, in the discretion of the Court; and

Such other general relief to which the plaintiff may be entitled.

Respectfully submitted,

Larry Sneed

Date: 3-31-2011

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